



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

March 4, 2009

Chief, Rulemaking, Directives, and Editing Branch  
U.S. NRC  
Mail Stop T6-D59  
Washington, D.C. 20555-0001

RE: Generic Draft Environmental Impact Statement for License Renewal of Nuclear Plants  
Supplement 37 Regarding Three Mile Island Nuclear Station, Unit 1 December 2008 CEQ  
#20080503

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA), Region 3, reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Based on our review of the Draft Environmental Impact Statement (DEIS), EPA has rated the environmental impacts of the preferred alternative as "EC" (Environmental Concerns) and the adequacy of the impact statement as "2" (Insufficient Information). A description of our rating system can be found at:

<http://www.epa.gov/compliance/nepa/comments/ratings.html>.

The Generic DEIS states that the purpose and need for the proposed action (issuance of a renewed license) is to provide an option that allows for power generation capability beyond the term of the current nuclear power plant operating license, and to meet future system generating needs, as determined by State, utility and where authorized, Federal (other than NRC) decision-makers.

The Generic DEIS states on page 3-3 that the replacement generators needed for this project will be manufactured in France and transported to the Three Mile Island-1 site. Transportation will be a combination of boat, barge, rail, and road. AmerGen (project sponsor) will be required to meet all Federal, State, and local requirements that may be applicable to dredge or fill activities, temporary or permanent removal of route interferences (such as narrow tunnels, and low-hanging overhead wires), and movement of wide or heavy loads over rail and roadways. Examples include temporary redirecting of streams, cofferdams, weight-bearing modifications to bridges, etc. There may also be air quality impacts associated with the transportation of the generators that are not discussed in this document.



AmerGen has contracted a vendor to conduct a detailed study of the steam generator transport process. The transportation study is scheduled to be completed in spring 2009. Until the study is complete, AmerGen cannot provide specific information regarding potential transportation routes for the replacement steam generators, work areas within the routes, or Federal, State, or local permits required for potential routes. EPA requests that the Final Environmental Impact Statement include the additional information on the transport process, its potential impacts and efforts to avoid environmental impacts.

The project team should work with state and federal resource agencies as the project develops to avoid and minimize impacts to the public and environment. We also recommend coordinating with the appropriate state and federal agencies annually to address any impacts to listed species and their habitats.

Thank you for the opportunity to offer these comments. If you have any questions, please contact me at (215) 814-5724.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Magerr', with a long horizontal flourish extending to the right.

Kevin Magerr  
Environmental Engineer

